

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**GRAPHIC ARTS MUTUAL INSURANCE
COMPANY**

Plaintiff,

v.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

Civil Action No. 06-246-JJF

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Graphic Arts Mutual Insurance Company (“Graphic Arts”) and Defendants Indian River School District, Indian River School Board, Harvey L. Walls, Mark A. Isaacs, John M. Evans, Richard H. Cohee, Gregory A. Hastings, Nina Lou Bunting, Charles M. Bireley, Donald G. Hatier, Reginald L. Helms, M. Elaine McCabe, Lois M. Hobbs, and Earl J. Savage (collectively “IRSB”), by counsel, move this Court to enter the attached order, pursuant to Paragraph 4(g) of the Rule 16 Scheduling Order.

Graphic Arts filed this action to, *inter alia*, determine its rights and obligations under the insurance contract for the *Dobrich* Action. IRSD filed a counter-claim alleging breaches and anticipatory breaches of the insurance contract. Graphic Arts and IRSD now request, by this Motion, an extension of the currently pending deadlines to resolve settlement discussions in the *Dobrich* Action.

Specifically, the parties request an extension of the deadlines for producing expert reports, amendment of pleadings, dispositive motions, and the pre-trial conference as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by August 22, 2008; from the defendant(s) by September 19, 2008;
- All motions to amend the pleadings shall be filed on or before March 31, 2008;
- All fact discovery must be completed by July 31, 2008 and all expert discovery must be completed by October 17, 2008;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before November 14, 2008. Briefing shall be pursuant to D. Del. LR 7.1.2
- A pretrail conference as scheduled by the Court, on or after November 14, 2008.

[Remainder of page intentionally left blank]

WHEREFORE, Graphic Arts and IRSB respectfully request that this Court enter the attached Order.

Dated: January 24, 2008

Respectfully submitted,

/s/ Warren Pratt

Warren Pratt (Del. Bar No. 4334)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street, Suite 1000
Wilmington, DE 19801
Telephone: (302) 467-4200
Facsimile: (302) 467-4201

Jason P. Gosselin (*pro hac vice*)
DRINKER BIDDLE & REATH LLP
One Logan Square
18th & Cherry Streets
Philadelphia, Pennsylvania 19103
Telephone: (215) 988-3371
Facsimile: (215) 988-2757

Attorneys for the Defendants

/s/ Timothy Houseal

Timothy Jay Houseal (Del. Bar No. 2880)
YOUNG, CONAWAY, STARGATT & TAYLOR LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 571-6675
Facsimile: (302) 571-1253

Michael S. Levine (*pro hac vice*)
HUNTON & WILLIAMS LLP
1751 Pinnacle Drive, Suite 1700
McLean, Virginia 22102
Telephone: (703) 714-7400
Facsimile: (703) 918-4050

*Attorneys for Graphic Arts Mutual
Insurance Company*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**GRAPHIC ARTS MUTUAL INSURANCE
COMPANY**

Plaintiff,

V.

Civil Action No. 06-246-JJF

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

STIPULATED ORDER

And now, on this ____ day of January, 2008, upon consideration of the parties joint request, it is hereby ORDERED and DECREED as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by August 22, 2008; from the defendant(s) by September 19, 2008;
- All motions to amend the pleadings shall be filed on or before March 31, 2008;
- All fact discovery must be completed by July 31, 2008 and all expert discovery must be completed by October 17, 2008;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before November 14, 2008. Briefing shall be pursuant to D. Del. LR 7.1.2

- A pretrial conference as scheduled by the Court, on _____ at _____.

Judge Joseph J. Farnan, Jr.